

# Exhibit 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

CHMURA ECONOMICS & )  
ANALYTICS, LLC, )  
Plaintiff, ) Case No. 3:19-cv-813-REP  
v. )  
RICHARD LOMBARDO, )  
Defendant. )

**DECLARATION OF LESLIE PETERSON**

I, Leslie Peterson, hereby declare under penalty of perjury as follows:

1. I am over the age of 18, and all of the facts in this declaration are within my personal knowledge.
2. I am the President and Chief Strategy Officer of Chmura Economics & Analytics, LLC, and have worked at Chmura since 2002. I am also an owner of Chmura and a member of its leadership team (called “SEA Group”).
3. Chmura’s specialty is labor market data. Chmura markets those data in two primary ways: through its Software-as-a-Service subscription (product, called JobsEQ®), and through consulting services on a wide range of economic topics.
4. JobsEQ allows clients to access and manipulate employment, wage, and demographic data. It is designed to allow our clients (which include economic developers, state and local governments, and colleges and universities, site selection entities, and for-profit companies) to identify unique workforce characteristics and trends within their communities and locations of interest.

5. Clients can customize their data in a variety of ways, including by building custom regions and testing the impact of certain economic events and forecasts with predictive modeling. Clients can also purchase add-on features that allow access to additional data and customization.

6. Chmura's JobsEQ data and reports, like other Chmura confidential information, are highly valuable. To protect its confidential information, Chmura has all employees review and acknowledge its information security policy, and limits access to Salesforce and other sales data to employees with a business need to know. Chmura also requires all employees to sign confidentiality agreements.

7. An initial subscription to JobsEQ can cost anywhere from \$5,000 to over \$30,000, depending on the amount and detail of the data the client wants to purchase. The average price of a one-year subscription is roughly \$8,000. Most clients renew their subscriptions for multiple years; Chmura's overall subscription renewal rate is 83%.

8. Because of JobsEQ's complexity, we do not expect new Account Managers to be ready to explain the product to clients, much less sell it, when they start at Chmura. Account Managers receive extensive training over a three- to six-month period about the various data options available through JobsEQ, the economics underlying those data, and the procedural intricacies of dealing with governmental clients.

9. A critical component of this training is learning how to demonstrate (or "demo") JobsEQ to prospective clients. The demo is often the turning point of the initial JobsEQ sales process, and preparing a successful demo is often the most time-intensive and important part of that process. In fact, that is one of our performance metrics for the sales team—demo to close ratios.

10. Although there are certain JobsEQ basics that we expect Account Managers to include in every demo, the best Account Managers, like Richard Lombardo, research prospective clients

ahead of time to better understand their workforce characteristics (such as the demographic and industry composition in their area) and tailor their demos to maximize the appeal of JobsEQ to each individual client.

11. As is apparent from their title, Account Managers also spend a significant portion of their time managing Chmura's existing client relationships. Account Managers are the primary point of contact for their clients. They perform services such as running data reports in JobsEQ or providing additional data on request, getting feedback from customers, answering questions, handling complaints, and coordinating Chmura's responses to questions or complaints they cannot answer themselves. As an Account Manager becomes more senior and accumulates more clients, this aspect of the job becomes more and more time-consuming and important.

12. Until 2019, we did not have any employees dedicated to determining what features and updates we should include in JobsEQ. So, we relied heavily on Account Managers—particularly our Senior Account Managers, Mr. Lombardo and Austen Steele—to guide Chmura's strategy in this regard.

13. In 2016, his first full calendar year at Chmura, Mr. Lombardo's salary and commissions totaled \$173,909, which then rose to \$175,880 in 2017. Mr. Lombardo made \$157,619 in 2018 and \$150,930 in the first 10 months of 2019.

Dated this 14 day of May, 2020.



Leslie Peterson